

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**SOUTHWEST MARINE AND GENERAL
INSURANCE COMPANY, as subrogee of
MembersAlliance Credit Union,**

Plaintiff

v.

AMONE AMANDA CHANTHALALAY,

Defendant.

Civil Action No. 3:24-cv-50003

REQUEST FOR ENTRY OF DEFAULT

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff, Southwest Marine & General Insurance Company, by and through its attorneys, hereby requests that the Clerk enter default against Defendant, Amone Amanda Chathalalay, on the basis that the record in this case demonstrates that Defendant, Amone Amanda Chathalalay, has failed to plead or otherwise defend.

Plaintiff relies on the attached Affidavit of Counsel in support of this request.

**McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP**

Dated: February 15, 2024

By: 

Matthew A. Lipman, Esq.
1617 JFK Boulevard, Suite 1500
Philadelphia, Pennsylvania 19103-1815
Telephone: (215) 557-2900
Facsimile: (215) 557-2990
mlipman@mdmc-law.com

*Attorneys for Plaintiff, Southwest Marine &
General Insurance Company*

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AFFIDAVIT IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

I, Matthew A. Lipman, Esquire, declare under penalty of perjury that the following facts are true and correct to the best of my information and belief:

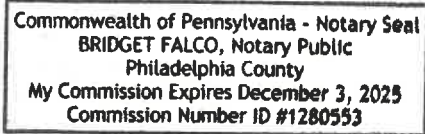
1. I am an attorney at law and a member of the Trial Bar of the Northern District of Illinois.
2. I have entered my appearance on behalf of Plaintiff Southwest Marine & General Insurance Company in the above-referenced matter.
3. Defendant is not an infant and is approximately 53 years old.
4. Defendant is not in the military service of the United States of America or any of its allies.
5. Defendant is not an incompetent person.
6. Service of process was made on Defendant on January 17, 2024. See ECF No. 4.
7. More than twenty-one (21) days have passed since Defendant was served.
8. Defendant has failed to plead or otherwise defend as required by the Federal Rules of Civil Procedure.

By:


Matthew A. Lipman, Esquire

Sworn and subscribed before me this
15th day of February, 2024


Notary Public



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CERTIFICATE OF SERVICE

I hereby state that on February 15, 2024, I served a true and correct copy of the foregoing document on the following via first class mail:

Amone Amanda Chathalalay
6378 Empress Lane
Rockford, IL 61109

Dated: February 15, 2024

By:


Matthew A. Lipman, Esquire